

SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO  
CENTRAL DIVISION

THE PEOPLE OF THE STATE OF  
CALIFORNIA,

Plaintiff

vs.

James Robert Brown

Defendant(s)

COMPLAINT - CRIMINAL

FELONY COMPLAINT

COURT CASE NO.

SEARCH WARRANT NO.

DA FILE NO. 2013V20495

Agency: Fresno Sheriff Department

Agency Report Number: 13-10617

Defendant  
James Robert Brown

Birth Date  
01/16/1963

JID  
7057505

Booking No.  
1328548

Personally appeared before me, who first being duly sworn, complains and alleges:

**COUNT 1**

On or about June 12, 2013, in the above named judicial district, the crime of CORPORAL INJURY TO SPOUSE/COHABITANT/CHILD'S PARENT, in violation of PENAL CODE SECTION **273.5(a)**, a felony, was committed by James Robert Brown, who did willfully and unlawfully inflict corporal injury resulting in a traumatic condition upon **Jane Doe**, who was the spouse, former spouse, cohabitant, former cohabitant and the mother or the father of his or her child.

Notice: Pursuant to Evidence Code 1370 it is the People's intention to seek to admit all victim statements to law enforcement if the victim becomes unavailable to testify at trial. Furthermore, pursuant to Evidence Code 1107, it is the People's intention to call an expert witness to testify at trial regarding battered women's syndrome as defined in Evidence Code 1107(a)-(e).

"NOTICE: Conviction of this offense as a felony will require you to provide two specimens of blood, a saliva sample, right thumbprints, and a full palm print impression of each hand pursuant to Penal Code section 296."

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**COUNT 2**

On or about June 12, 2013, in the above named judicial district, the crime of CRIMINAL THREATS, in violation of PENAL CODE SECTION **422**, a felony, was committed by James Robert Brown, who did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to **John Doe**, with the specific intent that the statement be taken as a threat. It is further alleged that the threatened crime, on its face and under the circumstances in which it was made, was so unequivocal, unconditional, immediate and specific as to convey to **John Doe** a gravity

of purpose and an immediate prospect of execution. It is further alleged that **John Doe** was reasonably in sustained fear of his/her safety and the safety of his/her immediate family.

\*\*\*\*\*

### COUNT 3

On or about June 12, 2013, in the above named judicial district, the crime of CRIMINAL THREATS, in violation of PENAL CODE SECTION **422**, a felony, was committed by James Robert Brown, who did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to **John Doe II**, with the specific intent that the statement be taken as a threat. It is further alleged that the threatened crime, on its face and under the circumstances in which it was made, was so unequivocal, unconditional, immediate and specific as to convey to **John Doe II** a gravity of purpose and an immediate prospect of execution. It is further alleged that **John Doe II** was reasonably in sustained fear of his/her safety and the safety of his/her immediate family.

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### COUNT 4

On or about June 12, 2013, in the above named judicial district, the crime of ASSAULT BY MEANS LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION **245(a)(4)**, a felony, was committed by James Robert Brown, who did unlawfully commit an assault on **John Doe** by means of force likely to produce great bodily injury.

"NOTICE: Conviction of this offense as a felony will require you to provide two specimens of blood, a saliva sample, right thumbprints, and a full palm print impression of each hand pursuant to Penal Code section 296."

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### COUNT 5

On or about June 12, 2013, in the above named judicial district, the crime of DISSUADING A WITNESS BY FORCE OR THREAT, in violation of PENAL CODE SECTION **136.1(c)(1)**, a felony, was committed by James Robert Brown, who did knowingly and maliciously do an act described in subdivisions (a) or (b) and such act was accompanied by force or an express or implied threat of force or violence upon **John Doe** or a third person or the property of a victim, witness or third person.

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### COUNT 6

On or about June 12, 2013, in the above named judicial district, the crime of RESIST, OBSTRUCT, DELAY OF PEACE OFFICER OR EMT, in violation of PENAL CODE SECTION **148(a)(1)**, a misdemeanor, was committed by James Robert Brown, who did willfully and unlawfully resist, delay and obstruct a peace officer who was then and there attempting to and discharging the duty of his/her office and employment.

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All of which is contrary to the form, force, and effect of the Statute in such case made and provided, and against the peace and dignity of the people of the State of California.

\* \* \* \* \*

Pursuant to Penal Code Sections 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

Subscribed and sworn to before me on

DATE: \_\_\_\_\_

Attest:

COMPLAINANT

\_\_\_\_\_  
DEPUTY CLERK